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SCOTT A. KRONLAND (SBN CA171693) (*pro hac vice*)
P. CASEY PITTS (SBN CA262463) (*pro hac vice*)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
E-mail: skronland@altber.com
cpitts@altber.com

Attorneys for Defendant SEIU Local 668

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

BETHANY LASPINA,

Plaintiff,

v.

SEIU PENNSYLVANIA STATE
COUNCIL; SEIU LOCAL 668; SEIU
HEALTHCARE PA; SEIU LOCAL 32BJ;
PENNSYLVANIA JOINT BOARD OF
WORKERS UNITED; LACKAWANNA
COUNTY LIBRARY SYSTEM;
SCRANTON PUBLIC LIBRARY,

Defendants.

CASE NO.: 3:18-CV-02018-MEM

NOTICE OF RELATED CASE

Hon. Malachy E. Mannion

Complaint Filed: Jan. 28, 2019
Trial Date: Not set.

Defendant Service Employees International Union Local 668 (“SEIU Local 668”) gives notice of a related case filed against SEIU Local 668 in this District:

Kioussis v. SEIU Local 668, No. 19-cv-01367-JEJ, filed on August 7, 2019.

The instant case (*LaSpina*) is a putative class action against SEIU Local 668,

among other unions. Plaintiff LaSpina is represented by SEIU Local 668 for collective bargaining purposes. Plaintiff LaSpina seeks certification of a plaintiff class that includes all public employees in Pennsylvania who paid fair share fees to SEIU Local 668. *See* Dkt. #41 at ¶45. LaSpina seeks a class-wide refund of those fair-share fees under 42 U.S.C. §1983.

Kioussis v. SEIU Local 668 is also a putative class action lawsuit. Plaintiff Kioussis is represented by SEIU Local 668 for collective bargaining purposes. Plaintiff Kioussis seeks certification of a class of all public employees who paid fair-share fees to SEIU Local 668. *See Kioussis*, Dkt. #1 at ¶1. Kioussis seeks a class-wide refund of those fair-share fees under 42 U.S.C. §1983.

Thus, the asserted §1983 claims in *Kioussis* are the same as claims asserted in *LaSpina*, and the proposed class in *Kioussis* is subsumed by the proposed class in *LaSpina*.

Date: August 21, 2019

Respectfully Submitted,

/s/P. Casey Pitts

P. Casey Pitts (CA262463)

SCOTT A. KRONLAND (*pro hac vice*)

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